

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS  
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**UNITED STATES POSTAL SERVICE'S INTERROGATORIES AND REQUEST FOR  
PRODUCTION OF DOCUMENTS TO STEVE HUTKINS  
(USPS/SH-RT1-1)  
(June 7, 2021)**

Pursuant to 39 C.F.R. § 3010.117(a), the United States Postal Service hereby submits the following interrogatories and request for production of documents to witness Steve Hutkins (USPS/SH-RT-1).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys,

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**USPS/SH-RT1-1:** On page 15, lines 3 and 4 of your testimony, you state that “For SCF Reno NV 895, 78 percent of volumes would be 4- or 5-day.”

- a. Please confirm that that figure is incorrect based on the cited library reference (SH-LR-N2021-1/1).
- b. Please refer to SH-LR-N2021-1/1. The excel tab labeled “Fig 8 % vol SSD 4 or 5” indicates, on row 819, that the correct figure for SCF Reno NV 895 is “53.07%.” Please confirm that figure or, if that is not correct, provide the correct figure.
- c. Please confirm that the 53% figure in SH-LR-N2021-1/1 is based solely on destinating volumes.
- d. Please confirm that the figure would be 37% if originating volumes were included as well, or, if that is not correct, provide the correct figure.
- e. If you still believe that the 78% figure provided is accurate, please provide any documents used to arrive at that figure.